

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MARIAH BOWLES,)	
)	
Plaintiff,)	
)	
v.)	Case. No. 4:18-cv-01869
)	
APRO INTERNATIONAL, INC., ET AL.,)	
)	
Defendants.)	

CONSENT MOTION FOR EXTENSION OF TIME
TO FILE A RESPONSIVE PLEADING

Comes now Defendant, Apro International, Inc. (“Apro”), by and through the undersigned counsel, and, with the consent of Plaintiff, respectfully moves this Honorable Court to extend the current deadline for Apro to file an answer or other response to Plaintiff’s Complaint from January 9, 2019 to February 14, 2019. In support thereof, Apro avers:

1. Plaintiff filed this action on October 31, 2018.
2. According to the docket, the Complaint and summons were received by Apro on December 19, 2018.
3. Prior to January 2, 2019, Plaintiff’s counsel and a representative of one of Apro’s insurers agreed that the time for Apro to file its answer or other response to Plaintiff’s Complaint may be extended to February, 2019.
4. On January 10, 2019, Plaintiff’s counsel emailed the undersigned counsel, confirming the aforementioned extension and requesting that the undersigned counsel file a motion to document the agreed extension date.

5. Based on the foregoing, Apro requests this Honorable Court to extend the current deadline to file an answer or other response to Plaintiff's Complaint from January 9, 2019 to February 14, 2019, per the agreement with Plaintiff.

6. By the filing of this consent motion, Apro is not waiving any defenses available to it, including, but not limited to, defenses it may have under Fed. R. Civ. P. 12. *See Swanson v. City of Hammond, Ind.*, 411 Fed.Appx. 913, 916 (7th Cir. 2011).

WHEREFORE, Defendant Apro International, Inc., respectfully moves for an extension of the current deadline to file an answer or other response to Plaintiff's Complaint from January 9, 2019 to February 14, 2019.

Respectfully submitted,

BROWN & JAMES, P.C.

/s/ Russell F. Watters

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Attorney for Defendant Apro

CERTIFICATE OF SERVICE

I certify that service of the foregoing was sent electronically through the ECF system this 11th day of January, 2019, to all counsel of record.

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/s/ Russell F. Watters